

Serial No. 09/778,142
Art Unit No. 2875

REMARKS

Claims 1-19 are currently pending in the patent application. The Examiner has rejected Claims 1, 5, and 9-14 under 35 USC 102(b) as being anticipated by the Bierhuizen patent. The Examiner has allowed Claims 6-8 and 16-19, and has objected to Claims 2-4 and 15 but indicated that those claims would be allowable if each was rewritten to not depend from a rejected base claim. Applicants are not submitting amendments to the objected-to claims at this time, since Applicants believe that all of the pending claims are allowable over the cited prior art.

The present invention provides apparatus and a method for controlling light including a spatial light modulator for projecting light on an area by tilting a reflecting surface, first and second light sources, each of which emits light that will be projected on the area based upon the angle of tilt of the reflecting surface of the spatial light modulator, and a control means for controlling the light emitted from each of the first and second light sources.

The Bierhuizen patent teaches a projection system having two perpendicularly-arranged light sources and a

Serial No. 09/778,142
Art Unit No. 2875

spatial light modulator with a plurality of tilt elements, each of which is tilttable about a tilt axis. Under the Bierhuizen patent system, light from each light source is directed by a different tilt element of the spatial light modulator so that light coming from all light sources will be deflected in the same direction (see: Col. 1, lines 54-58 and Col. 3, lines 21-35) to obtain optimal output from the light sources.

Applicants respectfully assert that the Bierhuizen patent does not teach or suggest the invention as claimed. The present invention claims a single reflecting surface in the light modulator while the Bierhuizen patent requires multiple reflecting tilt elements. In addition, the present invention teaches and claims that the single reflecting surface be tilted at a first or second angle in order to have only light from one of the sources, either the first or the second light source, be projected on the relevant area, while Bierhuizen provides for multiple tilt elements at multiple angles to ensure that all light from all sources be projected on an area at the same time. Finally, the Bierhuizen patent does not teach or suggest the claimed control section for controlling light emitted from the first

Serial No. 09/778,142
Art Unit No. 2875

and the second light sources. There is nothing in the cited Bierhuizen passages at Col. 2, lines 20-44 which either teaches or suggests the step of or means for controlling light from the light sources. In fact, since Bierhuizen seeks to maximize light which falls on an area, Bierhuizen effectively teaches away from controlling the light from the light sources.

It is well established under U.S. Patent Law that for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Bierhuizen patent does not teach a spatial light modulator with a single reflecting surface, does not teach first and second light sources for emitting light which is projected on an area by the single reflecting surface being tilted at different first and second angles, and does not teach a control section for controlling the first and second light sources, it cannot be maintained that the Bierhuizen patent anticipates each and every claim feature. Accordingly, Applicants respectfully request withdrawal of the anticipation rejection of Claims 1, 5, and 9-14 based on the Bierhuizen patent.

Serial No. 09/778,142
Art Unit No. 2875

Based on the foregoing amendments and remarks,
Applicants respectfully request entry of the amendments,
reconsideration of the amended claim language in light of
the remarks, withdrawal of the rejections, and allowance of
the claims.

Respectfully submitted,

Y. Ishikawa, et al

By:

Anne Vachon Dougherty
Anne Vachon Dougherty
Registration No. 30-374
Tel. (914) 962-5910

JP919990298

-13-